



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

September 2011 Grand Jury

**CR 11 00914**

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
SANJAY KISHOR SHAH, )  
 )  
Defendant. )  
 )  
 )  
 )  
 )

CR No. 11-

I N D I C T M E N T

[18 U.S.C. § 1014: False  
Statement on Loan Application]

The Grand Jury charges:

[18 U.S.C. § 1014]

On or about February 16, 2010, in Los Angeles County, within  
the Central District of California, and elsewhere, defendant  
SANJAY KISHOR SHAH ("defendant SHAH") knowingly made a material  
false statement for the purpose of influencing the action of  
Wells Fargo Bank, N.A., whose deposits were then insured by the  
Federal Deposit Insurance Corporation, in connection with a loan  
application, in that defendant SHAH stated in a Business Banking  
Loan and Treasury Management Application that California  
Management Solutions Inc., of which defendant SHAH stated he was

*sa*

1 the Chief Executive Officer and owner, had approximately \$148,000  
2 in a Citibank checking account, account # XXXXXXXX-6969, when in  
3 truth and in fact, as defendant SHAH then well knew, there was no  
4 account in the name of California Management Solutions Inc. at  
5 Citibank and it did not have approximately \$148,000 in it.

6  
7 A TRUE BILL

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10 Foreperson

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12 ANDRÉ BIROTTE JR.  
13 United States Attorney

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15 ROBERT E. DUGDALE  
16 Assistant United States Attorney  
17 Chief, Criminal Division

18 BEONG-SOO KIM  
19 Assistant United States Attorney  
20 Chief, Major Frauds Section

21 STEPHEN A. CAZARES  
22 Assistant United States Attorney  
23 Deputy Chief, Major Frauds Section

24 MONICA D. MANGE  
25 Assistant United States Attorney  
26 Major Frauds Section  
27  
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